

D. Gardner

UNITED STATES DISTRICT COURT

FILED

2011 APR -7 AM 11:28

CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXASBY K
DEPUTY

for the

United States of America

v.

Jessica CRUZ

Case No.

A-11-M-254

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 4, 2011 in the county of Williamson in the
Western District of Texas, the defendant(s) violated:

Code Section

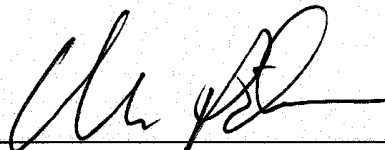
Offense Description

Title 18 USC 1956 (h)

Conspiracy to launder monetary instruments

This criminal complaint is based on these facts:

See Attachment.

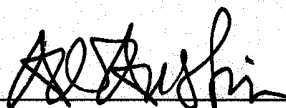
☒ Continued on the attached sheet.

Complainant's signature

Dean Peterson, DEA Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 4/7/2011

Judge's signature

City and state: Austin, Texas

Andrew Austin, U.S. Magistrate Judge

Printed name and title

1. On April 4, 2011, Round Rock Police Department Sgt. Justin Davis stopped a gold 2005 Chevrolet Uplander bearing Texas license plate CH9Y727 in the 1500 block of S. IH-35 Round Rock, Williamson County, Texas for following to close. Davis identified the driver of the vehicle as Jessica CRUZ by her Texas driver license. The passenger identified herself as Kassandra TREVINO.

2. Sgt. Davis questioned CRUZ who stated that she was returning to Eagle Pass from a trip to Ft. Worth. Sgt. Davis asked about the reason for her trip from Eagle Pass and Ft. Worth, Texas. CRUZ initially stated the reason for the trip was to get identification for TREVINO and a voter registration in Ft. Worth. CRUZ changed later changed the reason for the trip that they went shopping and to get their finger nails done. Sgt. Davis also noticed there was a single key in the ignition. Based on his training and experience a single is indicative of people involved in narcotics and money trafficking. Sgt. Davis asked CRUZ what was on the necklace she was wearing and she showed Davis the necklace which depicted Santa Muerte, Santa Muerte is symbol used by money and drug traffickers for protection.

3. CRUZ stated when they arrived in Ft. Worth, Texas they stayed in a Motel 6, CRUZ stated her brother paid for the room. When Sgt. Davis asked the name of CRUZ'S brother she began to argue with Sgt. Davis and asked why he needed her brother's name. Sgt. Davis stated he was making sure nothing illegal was going on. CRUZ then stated to Sgt. Davis he could search the vehicle.

4. Officer Raul Morales, Round Rock Police Department, spoke with CRUZ. CRUZ told Morales when she and her boyfriend crossed from Mexico into the United States she or boyfriend receives text messages or phone calls from an ICE Agent on what

lane to enter and what lane to avoid when entering into the United States.

5. Sgt. Davis asked CRUZ for consent to search the vehicle, which she granted. Based on the location of the stop, Sgt. Davis asked if they would follow them off the interstate for a safe location. For officer safety reasons Sgt. Davis asked CRUZ and TREVINO if he could hold onto their cellular phones. CRUZ stated that he could, but she wanted the phone turned off, which was done.

6. Sgt. Davis began the search of the vehicle. Sgt. Davis immediately noticed the air bag cover was not flush with the dash. Sgt. Davis easily pulled on the air bag cover back and immediately noted U.S. Currency wrapped in clear cellophane. Sgt. Davis placed CRUZ and TREVINO into handcuffs.

7. The vehicle was taken to the Round Rock PD where it was processed further. During the search of the vehicle 18 bundles of U.S. Currency totaling \$251,590.00 and 3 SIM Cards were seized. The cellular phones and (3) SIM cards were placed into evidence in accordance with Round Rock PD policy.

8. Officer MORALES advised CRUZ of her Miranda warning and CRUZ. CRUZ stated the following in regards to her trip. On April 3, 2011 they drove to Ft. Worth. CRUZ met "Mike" at a predetermined location. "Mike" took the vehicle and CRUZ went shopping. CRUZ got the vehicle back from "Mike" late on April 3, 2011 and she and TREVINO stayed the night. CRUZ and TREVINO left Ft. Worth on April 4, 2011 to go back to Eagle Pass, Texas. CRUZ stated when she arrived in Eagle Pass she was to park the van in a mall parking lot and leave the keys inside. CRUZ was then to call an unknown female who would pick up the vehicle. CRUZ stated her boyfriend's last name is TREVINO and is affiliated with the Mexican Mafia, a known drug trafficking

organization.